

Exhibit 2 - Plaintiff's Summary
of December 8, 2022 LR37.2
Conferral

P's Summary of Gardiner/Sikanich 37.2 12-8-22

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Good afternoon,

Please see below P's summary of the 37.2 held 12-8-22 regarding Defendant Gardiner's and Sikanich's responses to written discovery.

Defendants Gardiner and Sikanich will respond by 12/21/22 to the items discussed in the conferral via letter from counsel.

- Defendants' counsel will provide January and February availabilities/hard "no" dates for his clients in January and February regarding depositions.
- Gardiner rog 4: Defendant will obtain responsive information.
- Gardiner 7: Defendants' counsel will speak with his client, but the parties may be at impasse.
- Gardiner 12: both Defendants' and Plaintiffs' counsel will consider ways to narrow and reduce burden
- Gardiner 23: objection has been clarified, counsel will attempt to obtain responsive information from clients.
- Gardiner 24: Defendant's counsel will ask client, but parties may be at impasse.
- Sikanich rog 4: same as Gardiner 4
- Sikanich 7: same as Gardiner 7.
- Sikanich 12: may not be doable for Defendant, counsel will discuss with client.
- Sikanich 23: counsel will obtain responses.
- RFP 2: as rephrased by Plaintiff, counsel will produce and/or address more fully in response letter.
- RFP 3, 5, and 7: counsel will discuss/follow-up with clients and attempt to produce.
- RFP 8, 9, and 10: counsel will discuss/follow-up with clients as to whether they will produce without a court order.
- RFP 14-18: no acute disagreement over discoverability; counsel will discuss with clients.

Have a great weekend,

Daniel

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Daniel Massoglia

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Pronouns: he/him/his